

**IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE**

JOHN R. PURNELL III
APPELLANT-BELOW,
PETITIONER,

V.

DELAWARE DEPT. OF INSURANCE,
APPELLEE-BELOW,
RESPONDENT.

CIVIL ACTION NO.

18 - 1160

NOTICE OF REMOVAL

TO: JESSICA M. WILLEY, ESQ.
DEPUTY ATTORNEY GENERAL
241 SILVER LAKE BLVD.
DOVER, DE 19901

2018 AUG -3 PM 2:55
U.S. DISTRICT COURT
DOVER, DE
FILED
Nk

PLEASE TAKE NOTICE that JOHN R. PURNELL III, APPELLANT-BELOW/
PETITIONER, does herewith seek removal of the case captioned as **John R. Purnell III vs.**
Delaware Dept. of Insurance, Appeal No. 412, 2017, from the Delaware Supreme Court to this
Honorable Court for review pursuant to **28 USC § 1446** and **Federal Civil Rule of Procedure**

11. The petitioner asserts that the removal is warranted for the following:

1. Delaware Dept. of Insurance (“DOI”) has knowingly, intelligently, and maliciously abused the Administrative Procedures Act, which led to his bail producers’ license being revoked.
2. The attorneys for the DOI committed malfeasance by knowingly, intelligently, and maliciously allowing a spoliation of evidence in erasing the entire audio transcript of the petitioner’s revocation hearing a mere nine (9) days after the hearing. DOI subsequently manufactured an alleged “written transcript,” which was oddly devoid of any of the petitioner’s objections.

3. DOI committed mail fraud as a mechanism for making the petitioner's replies to the court untimely.

4. Petitioner provided evidence from the U.S. Postal Service showing the fraud, and the State Courts have refused to entertain the clear and concise misconduct by the DOI and its attorneys and staff.

5. Petitioner has voluminous filings and information from the proceedings below.

6. He's requested that the record be preserved by the Delaware Supreme Court, so that he may secure said record as evidentiary matter.

7. The instant Notice of Removal constitutes a mere notice, as per the statute and court rule. Petitioner intends to supplement his claim(s) at the Court's leave.

WHEREFORE, in light of the foregoing information, the petitioner prays that this Honorable Court removes the case cited herein from State Courts' jurisdiction, and review the host of official misconduct, mail fraud, and spoliation of evidence.

Respectfully Submitted,



John R. Purnell III
Petitioner

CERTIFICATE OF SERVICE

I, JOHN R. PURNELL III, do hereby certify that I've caused a true and correct copy of the foregoing NOTICE OF REMOVAL to be sent to the following party, by placing the same in the U.S. Mail this **3rd** Day of **August, 2018:**

JESSICA M. WILLEY, ESQ.
DEPUTY ATTORNEY GENERAL
DEPARTMENT OF INSURANCE
841 SILVER LAKE BLVD.
DOVER, DE 19904



SIGNED